

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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July 12, 1991

Mr. Tom Lukow
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

Roy Romer
Governor

Thomas M. Vernon, M.D.
Executive Director

Dear Mr. Lukow,

The Colorado Department of Health, Hazardous Materials Waste Management Division, the "Division", and the Environmental Protection Agency, "EPA" have reviewed the "Draft Proposed IM/IRA Decision Document for the Solar Ponds" which was received July 1, 1991.

As discussed the afternoon of July 3, 1991 with Mr. Joe Wienand and Mr. Kirk Ticknor, the format and content of the "Proposed IM/IRA Decision Document for the Solar Ponds" should follow the attached outline and should accomodate the "Record of Decision" (ROD) Guidance documents which were transmitted by Peter Ornstein at the July 3, 1991 meeting. The Interim Action format in the guidance documents assumes that a proposed plan has already been through the public comment process and is being summarized in a ROD. The IM/IRA Decision Document, on the other hand telescopes the RI/FS, Proposed Plan and ROD Process into a single focused document. The differences between the format in the "Record of Decision Checklist for Interim Source Actions" and the attached outline are due to the differences in scope and document timing of the IM/IRA process.

In the interest of expediting the Solar Ponds IM/IRA, it is in the best interests of the Interagency Agreement (IAG) parties to ensure that the next document submitted, the "Proposed IM/IRA Decision Document for OU4," is concise and complete. The IM/IRA must be implemented and completed in a manner that will allow the Department of Energy (DOE) to meet all of its IAG obligations for OU4 and facilitates meeting DOE commitments developed in the Agreement in Principle, (AIP). The goal of expediting the IM/IRA process can be accomplished by assuring that the next submittal of the "Proposed IM/IRA Decision Document" will readily meet regulatory approval. As a result of the extensive comments we are providing you, the document will need to undergo revisions. You will need to resubmit the proposal to us for regulatory review at least five days prior to the beginning of public comment. In an effort to expedite the regulatory process EPA and CDH are available for informal meetings to provide you guidance and to review sections of the "Proposed IM/IRA Decision Document" as they are drafted.

ADMIN RECORD

A-OU04-000028

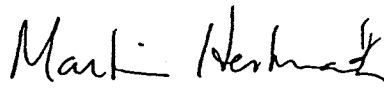
Since the Department of Energy has already made a "Finding of No Significant Impact" (FONSI) for this Solar Pond action, DOE's internal NEPA process should not be an obstacle to getting this IM/IRA out to public comment as expeditiously as possible.

If you have any questions regarding this letter or the attachments, please feel free to contact Arturo Duran at EPA 294-1080 or Noreen Matsuura at CDH 331-4920.

Sincerely,



Gary W. Baughman, Unit Leader
Hazardous Waste Facilities
Colorado Department of Health



Martin Hestmark, Manager
Rocky Flats Project
Environmental Protection Agency

cc: Peter Ornstein, EPA
Arturo Duran, EPA
Dan Miller, AGO
Barbara Barry, RFP
Joe Wienand, DOE/attachments
Kirk Ticknor, EG&G/attachments
Fraser Lockhart, DOE/attachments

Attachments:

- 1>Interim Measure/Interim Remedial Action Outline
- 2>Exhibit 6-2 Sample Declaration for the Record of Decision
- 3>6 CCR 1007-3 Part 264 Subpart J Tanks
- 4>Copy of Letter with concurrence from Fred Dowsett concerning ARAR's for Building 374 effluent. (August 22, 1989)
- 5>Surface Water standards for radionuclides promulgated April 30, 1991.
- 6> 40 CFR 141.11 Subpart B Maximum Contaminant Levels